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*Proposed Attorneys for the Debtor  
and Debtor-in-Possession*

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

BLUE STAR DOUGHNUTS LLC,  
DBA BLUE STAR DONUTS,

Debtor.

Case No. 20-32485-pcm11

Chapter 11

DECLARATION OF DANIEL R. KUBITZ  
IN SUPPORT OF DEBTOR'S MOTION  
FOR INTERIM AND FINAL ORDERS  
(I) AUTHORIZING PAYMENT OF  
PREPETITION WAGES, SALARIES,  
COMPENSATION, EXPENSES,  
BENEFITS, AND RELATED TAXES,  
(II) AUTHORIZING CONTINUATION OF  
EMPLOYEE BENEFITS POST-  
PETITION, (III) SCHEDULING A FINAL  
HEARING, AND (IV) GRANTING  
RELATED RELIEF

I, Daniel R. Kubitz, hereby declare under penalty of perjury:

1. I am an associate attorney of Stoel Rives, LLP, the proposed attorneys for Blue Star Doughnuts LLC ("**Debtor**") in the above captioned chapter 11 bankruptcy proceeding ("**Case**"). I am over 18 years of age. Except as otherwise stated herein, if I were called as a witness, I could and would competently testify to the matters set forth herein from my own personal knowledge.

2. The debtor filed its petition for relief under title 11 of the United States Code on August 26, 2020 (“**Petition Date**”).

3. On the Petition Date, the Debtor filed its *Motion for Interim and Final Orders (i) Authorizing Payment of Prepetition Wages, Salaries, Compensation, Expenses, Benefits, and Related Taxes, (ii) Authorizing Continuation of Employee Benefits Post-Petition, (iii) Scheduling a Final Hearing, and (iv) Granting Related Relief* (“**Motion**”) [Docket No. 12].

4. As directed by the Court at the first-day hearing on Friday, August 28, 2020 (“**First Day Hearing**”), attached hereto as Exhibit A is a statement (“**Wage Statement**”) setting forth the Employee Compensation<sup>1</sup> to be paid to the Debtor’s Employees that was earned between August 16, 2020 and August 25, 2020 (“**Prepetition Compensation Period**”). I assisted the Debtor in the preparation of the Wage Statement, and its accuracy has been confirmed by the Debtor’s human resources director.

5. In connection with the preparation of the Wage Statement, the Debtor determined that, in addition to Employee Compensation earned by certain of its part-time and full-time hourly employees during the prepetition period but unpaid as of the Petition Date, certain salaried employees had earned tips collected during the Prepetition Compensation Period that remained unpaid as of the Petition Date, which are reflected in the Wage Statement.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Pursuant to section 1746 of title 28 of the United States Code, I declare under penalty of perjury that the foregoing statement are true and correct.

DATED: September 2, 2020.

/s/ Daniel R. Kubitz

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Blue Star Doughnuts, LLC  
Prepetition Employee Wages and Tips (accrued 8/16/2020 to 8/25/2020)

Employee	Status	Hours	Wages	Tips	Total
Employee 01	PTH	22.00	\$297.00	\$123.91	\$420.91
Employee 02	PTH	28.28	\$381.78	\$159.29	\$541.07
Employee 03	PTH	11.71	\$158.09	\$65.96	\$224.05
Employee 04	PTH	32.26	\$469.39	\$181.70	\$651.09
Employee 05	PTH	20.10	\$271.35	\$113.21	\$384.56
Employee 06	PTH	19.57	\$264.20	\$110.22	\$374.42
Employee 07	PTH	23.35	\$342.98	\$131.52	\$474.50
Employee 08	PTH	0.00	\$0.00	\$0.00	\$0.00
Employee 09	PTH	15.48	\$234.34	\$87.19	\$321.53
Employee 10	PTH	1.00	\$18.00	\$0.00	\$18.00
Employee 11	PTH	28.79	\$465.44	\$162.15	\$627.59
Employee 12	PTH	0.00	\$0.00	\$0.00	\$0.00
Employee 13	PTH	7.04	\$116.16	\$39.65	\$155.81
Employee 14	PTH	29.43	\$485.60	\$165.76	\$651.36
Employee 15	PTH	13.66	\$225.39	\$76.94	\$302.33
Employee 16	PTH	5.30	\$82.15	\$29.85	\$112.00
Employee 17	FTH	42.46	\$700.59	\$239.15	\$939.74
Employee 18	FTH	33.72	\$556.38	\$189.92	\$746.30
Employee 19	FTH	49.83	\$822.20	\$280.66	\$1,102.86
Employee 20	FTH	43.92	\$680.76	\$247.37	\$928.13
Employee 21	salaried	n/a	\$0.00	\$305.10	\$305.10
Employee 22	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 23	salaried	n/a	\$0.00	\$305.10	\$305.10
Employee 24	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 25	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 26	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 27	salaried	n/a	\$0.00	\$305.10	\$305.10
Employee 28	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 29	salaried	n/a	\$0.00	\$0.00	\$0.00
Employee 30	salaried	n/a	\$0.00	\$0.00	\$0.00
	<b>Totals:</b>	<b>427.9</b>	<b>\$6,571.79</b>	<b>\$3,319.75</b>	<b>\$9,891.55</b>

PTH = Part-Time Hourly  
FTH = Full-Time Hourly